

Claims 1-7, 11, 13-15, 19-31, and 35-50 stand rejected under 35 USC § 103(a) as obvious over Kight et. al. (U.S. Patent No. 5,383,113) in view of Pintsov et. al. (U.S. Patent No. 5,612,889). The rejection is respectfully traversed.

The Examiner basically reiterates the arguments set forth in paper 8 in support of the rejection. It appears that the Examiner has misunderstood what was intended to be conveyed by the response of November 18, 1999. Applicant's representative apologizes if the manner in which the arguments were presented led to this confusion.

In any event, independent claims 1, 19, 35, 41 and 50, recite receiving sets of payment requests. It is respectfully submitted that Kight, although disclosing the receipt and processing of payment request received from individual payors, fails to teach or suggest receiving sets of payment requests (i.e. consolidated payment requests) of multiple payors as is required by each of the independent claims. Since Pintsov has not been cited for and does not disclose the receipt of sets of payments requests relating to payments by multiple payors to multiple payees, the independent claims of the present application are distinguishable over the applied art combination.

More particularly, Kight discloses a system, which allows an individual consumer (payor) to direct his/her payment requests of bills he/she receives from different billers through a service provider (column 1, lines 12-17, 30-32, 64 and 65, and claim 1, column 8, line 25). As disclosed, the system is accessed directly by the individual consumer via a remote telecommunications device (column 3, lines 55-57). Once connection with the system has been established, the consumer directs the system to make payments to individual payees (column 3, lines 57-59).

Thus, according to Kight, payment requests to pay a plurality of payees are received from each of the multiple payors. That is, payment requests from each individual payor are in all cases received separately from the payment requests from the other payors. Accordingly, Kight in particular, and the applied art combination in general, lack any teaching of suggestion of receiving respective sets of payment requests of or associated with multiple payors as required by each of the independent claims.

Although the Examiner points to Pintsov (column 7, lines 49-56) as teaching generating payment directions for paying a plurality of payees in accordance with a processed payment request, it is again respectfully submitted that the relied upon disclosure of mail processing which assigns a delivery destination code based on a unique identifier relates to altering a stored zip code due to an address change and has nothing whatsoever to do with generating payment directions for paying payees in accordance with the processed payment requests.

Rather, Pintsov is directed to a mail system for securely protecting the payment to the carrier service by insuring that the carrier service authorizes mail prior to its actual deposit into the postal stream. As described in column 12, line 51, through column 13, line 30, and shown in Figures 6 and 10, Each mail piece is marked with a mail piece ID 306 other than the zip code, which is used in the authorization process. The unique mail piece ID is used to access the correct mailing identification file to retrieve the extended zip code. The zip code is then printed on the mail piece as indicated by 1002. Nowhere does Pintsov describe generating payment directions for paying a plurality of payees in accordance with processed sets of payment requests.

Other features recited in the dependent claims of the present application are believed to further independently distinguish over the applied art combination. For example, claims 2, 3, 21, and 42-43 require that differently formatted sets of payment request be normalized. The Examiner acknowledges that Kight fails to teach receiving payment requests in a first, second and third format, but asserts that Kight teaches ensuring proper payment format (Col. 3, line 39) and that this corresponds to the recited limitation. However, Kight's disclosure in referenced text relates to ensuring that payments to merchants are in a proper format, and has nothing to do with normalizing payment requests.

Claims 7-10, 25-27, 36-38 and 47 require that payment information be used to identify an eleven-digit zip code, and that the identified zip code be used to access or retrieve a payee record. The Examiner acknowledges that Kight fails to disclose processing payment information to identify a zip code which is used to access or retrieve a payee record, but points to Pintsov (column 7, lines 49-52, column 10, lines 54-55, and column 12, lines 23-32) as disclosing the processing of payment information to identify a zip code.

However, to the extent Pintsov discloses processing payment information in the referenced text, it has nothing whatsoever to do with identifying a zip code. Rather, what the Examiner construes as payment information is processed only to debit the mailer's account. The discussion of the mailing ID file in the referenced text in column 10 is unrelated to the processing of what the Examiner construes as payment information, except to the extent the file is only sent to the mailer after the debiting of the mailer's account. Clearly, there is no identifying a zip code based on the relied upon processing.

In the referenced text, Pintsov also discloses altering the stored zip code due to an address change, but here again information is not used to identify an eleven-digit zip code, which is then used to access or retrieve a payee record. Pintsov describes using a unique ID other than the zip code (see for example Figure 6 and column 12, line 51, through column 13, line 15) to access a stored payee record to obtain a zip code and prints the zip code on a piece of mail. The unique ID is also, when appropriate, used to access a stored payee change of address record to obtain a changed zip code, which is substituted for the original zip code in the stored payee record. Hence, Pintsov is clearly distinguishable.

In addition, the Examiner takes Official Notice that accessing a database to locate payee information corresponding to the eleven-digit zip code is old and well known in the art. However, the claims do not simply recite using a zip code for accessing a database to locate payee information corresponding to the zip code. Rather, the claims require using a zip code, which is identified by processing information, to locate or retrieve a file or record which has an associated corresponding zip code.

Claims 11, 28-30, 40 and 48 require identifying characters of an account number or processing a received account number to select or identify a single delivery point to which payment is directed. The Examiner acknowledges that Kight fails to disclose identifying one of a plurality of remittance centers, but points to Pintsov (column 11, lines 39-51) as describing the use of a zip code to identify a single delivery point to which delivery is directed.

However, the claims require that the payment delivery point be identified or selected based on account number information, not zip code information. Even if the Examiner is correct in

now arguing that Pintsov's unique ID corresponds to an account number (which is not admitted by Applicant's representative) and that the unique ID is used to identify a delivery point (i.e. a zip code), Pintsov still lacks, and the Examiner has not identified within the combined art, any disclosure of using an account number to identify or select one of a plurality of different delivery points for directing payment.

Claims 13-15, 31, 39 and 49, require transforming the account number included in a payment request into an altered account number according to the alteration rules and/or validating a received or altered account number according to validation rules. The Examiner acknowledges that Kight fails to disclose alteration rules and transforming the account number included in one of the payment requests into an altered account number according to the alteration rules, but points to Pintsov (column 10, lines 61-65, column 11, lines 56-67 and column 12, lines 1-4) as describing the recited features.

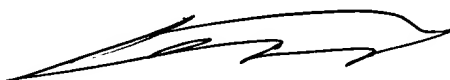
The Examiner's rationale is not understood, since Pintsov lacks any disclosure of altering an account number. What Pintsov does disclose in the referenced text is altering a zip code (not an account number) due to an address change. Further, the Examiner recent reference to column 10, also does not support the Examiner's position, since the newly referenced text does not describe any alteration of the unique ID. There is no suggestion that a received unique ID is somehow processed and altered. It is unclear also why the Examiner considers the fact that ID's will be different for different mailers relevant.

Further, the combined art lacks any teaching or suggestion of the recited features relating to validation of the account number. It appears that these features have been entirely ignored, since the Examiner has not identified any disclosure within the combined art in connection with such features.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0427 and please credit any excess fees to such deposit account.

Respectfully submitted,
Lalos & Keegan



Alfred A. Stadnicki
Registration No. 30,226

AAS/led
1146 Nineteenth Street, NW
Fifth Floor
Washington, D.C. 20036-3703
Telephone (202)887-5555
Facsimile (202)296-1682
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